



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 9, 2021

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Ronald Romano*, 20 Cr. 585 (ALC)**

Dear Judge Carter:

The Government respectfully writes, with the consent of the above-referenced defendant's counsel, to request an adjournment of the status conference, currently scheduled for March 15, 2021, at 10:00 a.m. During the next few weeks, the Government anticipates production to the defense of additional discovery consisting primarily of a large volume of email and electronic correspondence. Accordingly, the parties request a forty-five day adjournment of the status conference. The Government further requests, with the consent of the defendant's attorney, Mark Macron, Esq., that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference. The exclusion of time will enable the Government to complete the production of discovery and the defense time to review that discovery and consider possible motion practice.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York

By: \_\_\_\_\_

Nicholas W. Chiuchiolo  
Timothy V. Capozzi  
Assistant United States Attorneys  
(212) 637-1247 / 2404

cc: Mark Macron, Esq.